

Cody Wofsy\*  
American Civil Liberties Union  
Foundation, Immigrants' Rights  
Project  
39 Drumm Street  
San Francisco, CA 94111  
(415) 343-0770  
cwofsy@aclu.org

Omar C. Jadwat\*  
American Civil Liberties Union  
Foundation, Immigrants' Rights  
Project  
125 Broad Street, 18th Floor  
New York, NY 10004  
(212) 549-2660  
ojadwat@aclu.org

Alex Rate  
Elizabeth Ehret  
American Civil Liberties Union of  
Montana Foundation, Inc.  
P.O. Box 9138  
Missoula, MT 59807  
Telephone: (406) 203-3375  
ratea@aclumontana.org  
ehrete@aclumontana.org

Danielle Coffman  
Crowley Fleck, PLLP  
1667 Whitefish Stage  
Kalispell, MT 59901  
Telephone: (406)752-6644  
dcoffman@crowleyfleck.com

*\*Pro Hac Vice Forthcoming*

**UNITED STATES DISTRICT COURT  
DISTRICT OF MONTANA  
GREAT FALLS DIVISION**

ANA SUDA and MARTHA  
HERNANDEZ,

*Plaintiffs,*

V.

UNITED STATES CUSTOMS AND  
BORDER PROTECTION; CBP  
COMMISSIONER KEVIN K.  
MCALEENAN, in his official  
capacity; CBP AGENT PAUL  
O'NEAL, in his individual and official  
capacities; and JOHN DOES 1-25, in  
their individual and official capacities.

*Defendants.*

)  
)  
) Civil Action No. CV-19-10-GF-  
) BMM

**MOTION FOR *PRO HAC VICE*  
ADMISSION OF OMAR C.  
JADWAT**

Plaintiffs, through counsel of record, respectfully move the Court for an Order permitting Omar C. Jadwat, of the American Civil Liberties Union Foundation, Immigrants' Rights Project, to join Alex Rate and Elizabeth K. Ehret, ACLU of Montana Foundation, and Danielle Coffman, Crowley Fleck, PLLP, as co-counsel in the above-entitled matter. The declaration of Mr. Jadwat is attached as Exhibit A.

Mr. Jadwat has complied with rules governing *pro hac vice* appearance. Mr. Jadwat is currently in good standing in the jurisdictions he is admitted in.

Mr. Jadwat can be reached through the following contact information:

Omar C. Jadwat\*  
American Civil Liberties  
Union Foundation,  
Immigrants' Rights Project  
125 Broad Street, 18th Floor  
New York, NY 10004  
(212) 549-2660  
ojadwat@aclu.org

In connection with this motion, the undersigned represents that he is admitted to practice in Montana, is a resident of Montana, is familiar with Rules 83.1 (d) and 83.2 of the Local Rules of Procedure of the United States District Court for the District of Montana, and is prepared to comply with said rules in all respects.

For the foregoing reasons, Plaintiffs respectfully request that the Court GRANT their Motion for *pro hac vice* admission of Omar C. Jadwat in the above entitled case. A proposed order is attached.

Respectfully submitted this 15<sup>th</sup> day of February, 2019.

/s/ Alex Rate

Alex Rate  
AMERICAN CIVIL LIBERTIES  
UNION OF MONTANA  
FOUNDATION, Inc.  
P.O. Box 9138  
Missoula, MT 59807

*Counsel for plaintiffs*